

I would propose in the rulemaking or future rulemakings that might result from RM-10803 that the following be included as a proposal (or 'counterproposal') if the legal definition of that term applies to these comments. it is as follows:

Amend the Table of Allotments for both FM and TV stations to assign each channel presently in the table, where multiple channels are assigned to a community, to a community that does not presently have an allotment. TV allotments could duplicate any one FM allotment.

This would serve many hundreds, if not thousands more communities, particularly in larger metro areas. That was the purpose of Docket 80-90, and that has failed somewhat to serve the public interest sufficiently.

Noncommercial Educational FMs and TVs licensed to a community would duplicate any commercial FMs and TVs licensed to the same community, but only if the NCE-FM or TV was licensed to an accredited educational institution. This would apply only to NCE-FM stations as noted, licensed to a high school, college, university, or community college. A private school that is accredited, and has a substantive physical campus with buildings, could stay in the same community of license. NCE-FMs licensed to an educational institution are licensed to promote an educational program, such as support the school of music at that school and the immediate community surrounding it.

Also there should be requirements, similar to those that were relaxed and eliminated by the commission in the early 80s, that require the station to air news and public affairs programming on a daily basis (such as hourly news, and other short-form programming), directly from their Community of License. This could be addressed in a future NPRM related to this same proceeding. The reason being is that there are some very large networks, such as Educational Media Foundation and Calvary Satellite Network, that are feeding all the stations they own with one programming feed, maybe two, and it's very unlikely to hear programming aimed at the local community the stations are licensed to serve.

A good example of how such stations could serve their Communities of License is demonstrated by the way Minnesota Public Radio allows insertions in their 'Classical 24' service. They program it so the first five minutes of nearly every hour can be filled with local/national news, and there are one-minute breaks at about 20 and 40 past each hour for local insertions, used to quite good extent by the local stations that use the feed.

I also note that I never hear weather forecasts on some stations that are known as 'rimshotters' in the broadcast press. An example of a commercial station 'rimshotting' is KWKD Randolph Utah, on Channel 272C. What I'd give to know how cold it got there. Randolph Utah is the coldest place in the state during the winter, with temperatures far below zero there even when the Wasatch Front which receives its signal via four boosters, is far warmer. They have not aired any local programming for Randolph since the station went on the air. I've never heard the local news for Randolph or a

weather forecast for the community of license since the station went on the air, just some half-hour programs, at 6am on Sunday, for Salt Lake listeners.

The LPFM rules should allow L2's in urban areas where L1 LPFMs do not fit now due to technical reasons. Ten-watt stations could go where any translator can fit. L2 stations could be applied for to replace translators in urban areas, as some translators are largely nothing more than rimshot stations aimed at the urban center the translator was placed in. NCE-FM Translators licensed to accredited educational institutions, defined supra, within 150 miles of the urban center, or within the state (whichever is larger) could not be replaced by a LPFM but could be replaced by a new station Class A or higher. An accredited educational institution could supplant a commercial translator with a noncommercial translator as well, but must follow the same regional restriction above.